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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CARL BRADLEY,

Petitioner,

v.

ATTORNEY GENERAL OF THE STATE
OF NEVADA, et al.,

Respondents.

Case No. 2:13-cv-01196-APG-GWF

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE
AMENDED MOTION FOR
DISCOVERY**

Carl Bradley moves this Court for an extension to time of 30 days from January 13, 2016, until February 12, 2016, to file an Amended Motion for Discovery. This motion is based upon the attached points and authorities and the record in this case.

DECLARATION OF MELANIE GAVISK

1. On September 30, 2015, this Court appointed the Federal Public Defender to represent Mr. Bradley in this case. ECF 33. After the conflict check was completed, I (Melanie Gavisk) entered my appearance as counsel for Mr. Bradley on December 14, 2015. ECF 35. An amended motion for discovery is currently due on January 13, 2016, per this Court's November 10, 2015 order. ECF 34. For the reasons described below, I request an additional 30 days, until February 12, 2016, to file the amended discovery motion.

2. In preparation for filing an amended discovery motion, I have collected and reviewed the state court record and the record in this case. I have contacted prior counsel for their files, but prior counsel have indicated they do not have files for Mr. Bradley. Most recently, I contacted Jeffery Connor, the Deputy Attorney General assigned to this case. He indicated to me that pursuant to this Court's prior order granting discovery, *see* ECF 10, the State may disclose additional materials to Mr. Bradley.

3. If the State discloses additional materials, that will impact what materials, if any, Mr. Bradley requests in an amended discovery motion. Mr. Bradley therefore requests an additional 30 days to file an amended discovery motion.

4. On January 12, 2016, I contacted Deputy Attorney General Jeffrey Connor about this motion for an extension of time. Mr. Connor indicated he has no opposition to this motion.


5. I therefore ask this Court to grant my request for an extension of time of 30 days to file the amended discovery motion and order the amended discovery motion to be filed no later than February 12, 2016.

Dated this 13th day of January, 2016.

Respectfully submitted,
RENE L. VALLADARES
Federal Public Defender

/s/ Melanie Gavisk
MELANIE GAVISK
Assistant Federal Public Defender

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
United States District Judge
DATED this 20th day of January, 2016.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he is an employee in the office of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on January 13, 2016, he served a true and accurate copy of the foregoing to the United States District Court, who will e-serve the following addressee:

Jeffrey M. Connor
Deputy Attorney General
Nevada Attorney General's Office
100 North Carson Street
Carson City, NV 89701

/s/ Adam Dunn

An Employee of the Federal Public
Defender, District of Nevada